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June 29, 2021

Honorable Brian M. Cogan  
United States District Court Judge  
Eastern District of New York  
225 Cadman Plaza  
Brooklyn, New York 11201

RE:     *USA v. Si Lung Chung*  
*Dkt No. 18-cr-407*

Dear Judge Cogan,

I am writing to you today in regard to the sentencing of Si Lung Chung scheduled for Your Honor on July 15, 2021.

Mr. Chung was arrested on August 16<sup>th</sup>, 2018. He pled guilty on January 14, 2020 before Magistrate Judge Vera M. Scanlon to one count of a five count indictment. The defendant imported generic goods, like hand bags and caused counterfeit labels or emblems to be affixed to the generic goods. He completely accepts responsibility for his conduct.

I have represented Mr. Chung from shortly after his arrest in August of 2018. From the outset he has accepted responsibility for his wrongful conduct. He certainly knows now and is fully aware of the seriousness of dealing with counterfeit goods and arranging to put counterfeit emblems on generic handbags.

Mr. Chung came to the United States on The Golden Venture which became a legendary piece of immigration history in that the people who were smuggled here on that ship were treated

much more as slaves than human beings. Many of those people like Mr. Chung barely survived the voyage.

He eventually obtained immigration documentation and in 1993 became a naturalized U.S. Citizen.

Both Mr. Chung and his wife have already satisfied the forfeiture money judgement against them by each paying the full \$95,000 in cashier's checks to U.S. Customs and Border Protection. This was done in February of 2020.

Mr. Chung has never been in any other trouble of any kind in the United States. He and his wife have worked hard at their business and raised two great children who are succeeding in the medical field.

Mr. Chung was treated for a brain tumor some years ago but continues to do well and continues to work.

Annexed to this letter are additional letters from Mr. Chung's son and daughter as well other letters from friends.

The letters to the Court describe a hardworking, caring decent man who is an asset to our society.

Under 18 U.S.C. 3353(a)'s mandate, a Court should impose a sentence that is sufficient but not greater than necessary to achieve the goals of sentencing. Mr. Chung's bad conduct ended three years ago. He has fully recognized the wrongs he did and has in every way tried to redeem himself. His total dedication to his family hopefully will allow the court to give him a chance to continue to support and care for his wife and children. A sentence of probation will be sufficient but not greater than necessary to achieve all goals of sentencing.

Thank you for your consideration.

Respectfully submitted,



Paul A. Goldberger, Esq.

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